

# ASH GROVE CEMENT COMPANY

WESTERN REGION

December 18, 1997

Mr. Fred Austin  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle Washington 98101-2038

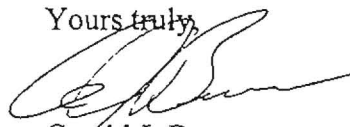
Re: Draft Order of Approval No. 6708

Dear Mr. Austin;

Ash Grove Cement Co. requests that the above order not be finalized on January 9, 1998 as stated in your December 16, 1997 letter. Additional time is required to collect the data necessary to substantiate or propose appropriate modifications to those conditions specified in 6 and 7 of the draft order.

The additional time is necessary since data collection is only possible during kiln preheat. A phase of kiln startup that is not routine, predictable and rarely scheduled.

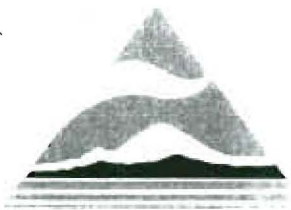
Yours truly,



Gerald J. Brown  
Manager, Safety and Environmental

cc: HV  
HES

**AGCS2M002254**



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

December 16, 1997

Gerry Brown  
Manager, Safety and Environment  
Ash Grove Cement Company  
3801 E Marginal Wy S  
Seattle, WA 98134

Dear Mr. Brown:

Ash Grove Cement Plant  
Draft Order of Approval No. 6708

Enclosed is draft Order of Approval No. 6708 sent with PSAPCA's letter dated November 12, 1997. PSAPCA expects to final this Order of Approval by January 9, 1998. Please provide any additional comments or information for consideration.

If you have any questions, contact me at (206) 689-4055 in Seattle.

Sincerely,

Fred L. Austin  
Air Pollution Engineer

FLA:mj  
Enclosure

cc: D. S. Kircher  
N. J. Shulman  
J. M. Willenberg  
E. M. Gilpin  
M. McAfee

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
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Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
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SEA0658

# Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL  
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 11339

Notice of  
Construction No. 6708

**DRAFT**

This Order of Approval No. 6708 supersedes Orders of Approval No. 3382, and No. 5730 which added the following equipment: a 120 ton/hour Clinker Pre-grind Crusher with a Baghouse at 20,000 cfm, and a Finish Mill High Efficiency Separator Project including two 60 ton/hour High Efficiency Separators with two Baghouses at 77,000 cfm each, two Baghouses at 10,000 cfm each, and one Baghouse at 5,000 cfm.

GERALD J BROWN

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ASH GROVE CEMENT COMPANY (E MARG.),  
3801 E MARGINAL WY S  
SEATTLE WA 98134-1113

ASH GROVE CEMENT COMPANY (E MARG.),  
3801 E MARGINAL WY S  
SEATTLE WA 98134-1113

## INSTALLATION ADDRESS

ASH GROVE CEMENT COMPANY (E MARG.), 3801 E MARGINAL WY S, SEATTLE, WA, 98134

## THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

- Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
- This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
- This source is subject to Subparts A and F of 40 CFR Part 60.
- PM-10 emissions from each baghouse except the main stack baghouse shall not exceed 0.005 grains/dscf over a twenty-four hour period. Ash Grove may demonstrate compliance with this condition by any of the following:
  - Performing a PSAPCA approved source test according to EPA Method 5 or EPA Method 201A;
  - Demonstrating no visible emissions for 15 consecutive seconds;
  - Demonstrating no visible emissions for three consecutive minutes; or
  - Repairing within 24 hours any baghouse that has visible emissions for more than three consecutive minutes.Compliance shall be determined for visible emissions using EPA Method 22. PSAPCA may require a source test for any baghouse that has sustained visible emissions, unless such emissions are unavoidable under WAC 173-400-107.
- Except during startup and shutdown of the kiln, scheduled maintenance and for emissions considered unavoidable under WAC 173-400-107, emissions from the main baghouse shall not exceed the most stringent of PSD limits or the following limits:
  - Carbon monoxide (CO) shall not exceed 1049 ppm (parts per million) corrected to 10% oxygen (O<sub>2</sub>) for an 8-hour average, and CO shall not exceed 2353 tons per year;
  - Nitrogen oxides (NO<sub>x</sub>) shall not exceed 700 ppm (parts per million) corrected to 10% oxygen (O<sub>2</sub>) for a 1-hour average, and NO<sub>x</sub> shall not exceed 501 ppm corrected to 10% O<sub>2</sub> for a 24-hour average, and NO<sub>x</sub> shall not exceed 1846 tons per year;
  - Sulfur dioxide (SO<sub>2</sub>) shall not exceed 180 ppm corrected to 10% oxygen (O<sub>2</sub>) for a 1-hour average, and SO<sub>2</sub> shall not exceed 176 tons per year; and
  - Particulate matter (PM) shall not exceed 10.6 pounds per hour and 46 tons per year.
- During startup and shutdown of the kiln, and during scheduled maintenance, the emissions from the main baghouse shall not exceed the most stringent of PSD limits or the following limits:
  - CO shall not exceed 1049 ppm corrected to 10% O<sub>2</sub> for an 8-hour average;
  - NO<sub>x</sub> shall not exceed 1000 ppm corrected to 10% O<sub>2</sub> for a 1-hour average, and NO<sub>x</sub> shall not exceed 501 ppm corrected to 10% O<sub>2</sub> for a 24-hour average; and
  - During the preheat period of startup, prior to the introduction of feed to the kiln, the main baghouse stack shall not exceed 212 pounds per hour SO<sub>2</sub> for a 1-hour average; and
  - During the feed introduction period to the kiln, SO<sub>2</sub> shall not exceed 200 ppm corrected to 10% O<sub>2</sub> for a 1-hour average.
- Ash Grove shall:
  - Submit for Control Officer approval, a report as a modification of the Operation and Maintenance Plan within 120 days of this Order (or at a time otherwise approved by the Control Officer), verifying the kiln stack SO<sub>2</sub> will comply with the limits of Condition No. 6(c) during the preheat period of startup. This report shall also define kiln startup, shutdown, preheat, feed introduction, scheduled maintenance, procedures for monitoring stack operating parameters and any calculation procedures for monitoring stack operating parameters and any calculation procedures for compliance verification of Condition No. 6(c).

- (b) Install a continuous emission monitor that meets Article 12 of Regulation I to measure SO<sub>2</sub> emissions during kiln preheat period of startup within 240 days of this Order (or at a time otherwise approved by the Control Officer), if no approval is granted for the requirement of Condition 7(a); and
  - (c) Submit a Quality Assurance Quality Control plan meeting Article 12 of Regulation I for the continuous monitoring system that measures O<sub>2</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, the main stack flow rate, and any monitoring system used to verify Condition No. 6(c), within 120 days (or at a time otherwise approved by the Control Officer) of this Order.
- 8. Ash Grove shall perform all main stack source tests following Regulation I, Section 3.07, and all particulate source tests for compliance of the main stack shall be performed using PSAPCA Method 5 or EPA Method 201A/202.
  - 9. Ash Grove shall demonstrate compliance with emission limits of Conditions No. 5 and No. 6 and the opacity limits of Regulation I, Section 9.09(b) with a continuous monitoring system for the measurement of O<sub>2</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, the main stack flow rate and the approved monitoring system used to verify Condition 6(c) which all meet the requirements of Article 12 of Regulation I.
  - 10. This Order of Approval supersedes and cancels Order of Approval No. 5730 dated Dec 29, 1994.

# DRAFT

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FREDRICK L. AUSTIN  
Reviewing Engineer  
MEJ

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JAY M. WILLENBERG  
Reviewing Engineer

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DENNIS J. McLERRAN  
Air Pollution Control Officer